NC and NCI Codes

The NC and NCI codes are used to indicate that an xDSL capable loop is being requested and identify the PSD mask for the technology the CLEC has chosen to deploy on the requested loop.

The following table illustrates the current NC, NCI, and Service Code for each PSD. The NCI codes are the same at both the central office and end user location (NCI and SECNCI on the LSR).

PSD #	NC Code	NCI Code
1	LX--	02DU5.001
2	LX--	02DU5.002
3 (2 wire)	LX--	02DU5.003
3 (4 wire)	LX--	04DU5.003
4	LX--	02DU5.004
5	AC--	02DU9.005
7	LX--	02DU9.007

One-Step Process

A combined one-step loop qualification and xDSL loop order process was developed in response to CLEC requests for a process that did not require completion of separate xDSL loop qualification and xDSL loop requests. At their option, CLECs may combine the loop qualification process with the loop order process using the One-Step process. This process is outlined below:

The CLEC submits an LSR for an xDSL-capable loop via fax, LEX , or EDI. The PSD mask of the technology the CLEC plans to deploy is indicated on the LSR. If no prior loop qualification is indicated in the Remarks section of the LSR, the LSC will automatically initiate a loop qualification request.

SWBT will complete the loop qualification and return the results to the CLEC.

If the loop qualification results indicate the loop meets the specifications indicated by the CLEC on the LSR, the xDSL capable loop order will be issued. No further CLEC input is required and a Firm Order Confirmation ("FOC") will be sent to the CLEC.

If the loop does not meet the specifications indicated by the CLEC, the LSR will be rejected. The CLEC then has the option of canceling the request if the loop does not meet its needs, or supplementing the LSR to revise the specifications. Such supplementing does not "restart" the loop qualification process. However, SWBT operations cannot start the provisioning process on a loop that does not meet a CLEC's specifications until it receives further direction from the CLEC.

"AS IS" Option:

As part of this one-step process, SWBT has provided the CLECs the option of specifying on the LSR that the CLEC wants the loop "as is" regardless of the results of the loop qualification. This is done by using the SPEC code "UALNQX"[1] on the LSR. This eliminates the need for CLECs to send supplemental LSRs in cases where the loop may not meet current industry standards or draft standards but the CLEC knows, prior to viewing the completed loop qualification results, that it wants SWBT to provision the order. (The CLECs may be able to make this judgement based on the pre-qualification results.)

If the CLEC specifies "as is" on the LSR, SWBT will perform a pre-qualification upon receipt of the LSR. If the pre-qualification result is "Green," SWBT will issue a service order immediately and will return the FOC to the CLEC. No loop qualification will be performed. If the pre-qualification result is "Yellow" or "Red," a loop qualification will be performed and the order will be processed using the standard one-step process as described above.

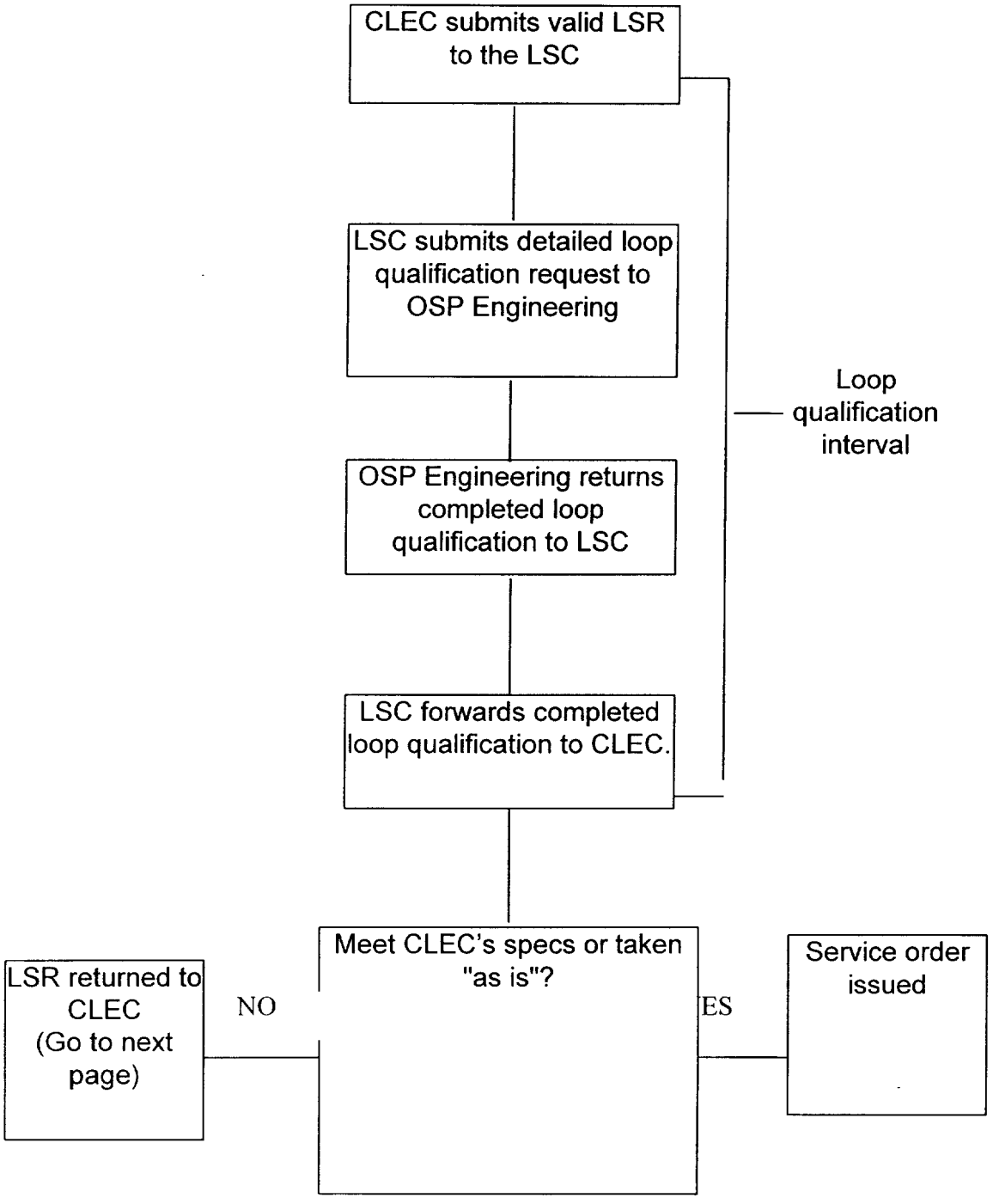
CLECs have an additional option for xDSL loops used to provision PSD #5 (ADSL). CLECs that are interested in this option should contact their LPAT account manager. If the CLEC chooses this option, all of the CLEC's PSD #5 xDSL capable loop requests will be processed in this manner. At the CLEC's direction, SWBT will immediately begin the provisioning process for any PSD #5 request specifying a

[1] This SPEC code is what is used today. Additional SPEC codes may be added in the future to provide more options to the CLECs.

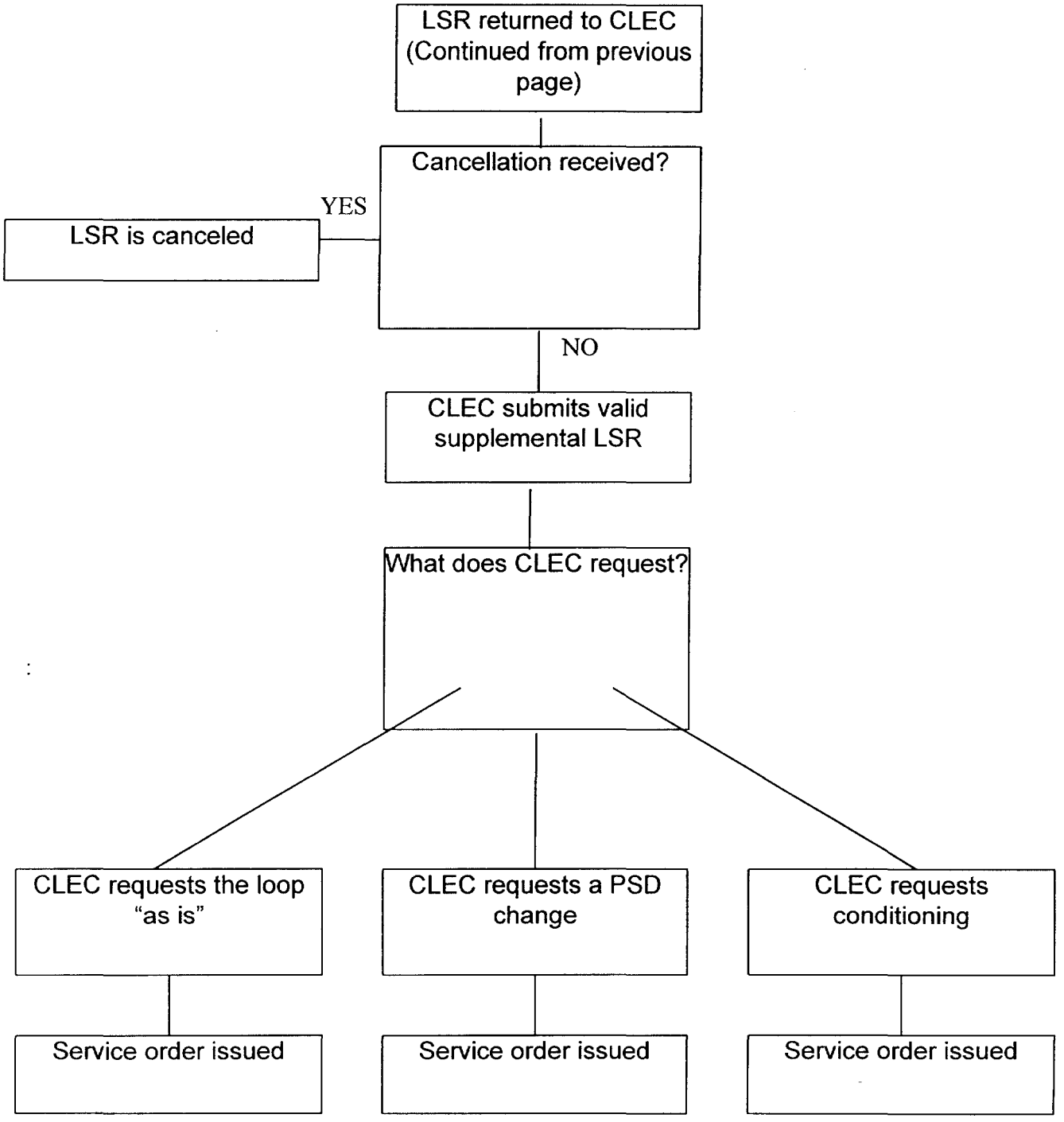
loop that meets the minimum qualification standards if the pre-qualification result is "Green." Should the CLEC choose this option, the CLEC will still receive a loop qualification report, although SWBT operations will create the report *concurrently* with the provisioning of the loop.

An illustration of the One-Step Process follows:

One-Step Process
Loop Qualification Performed During Order Process

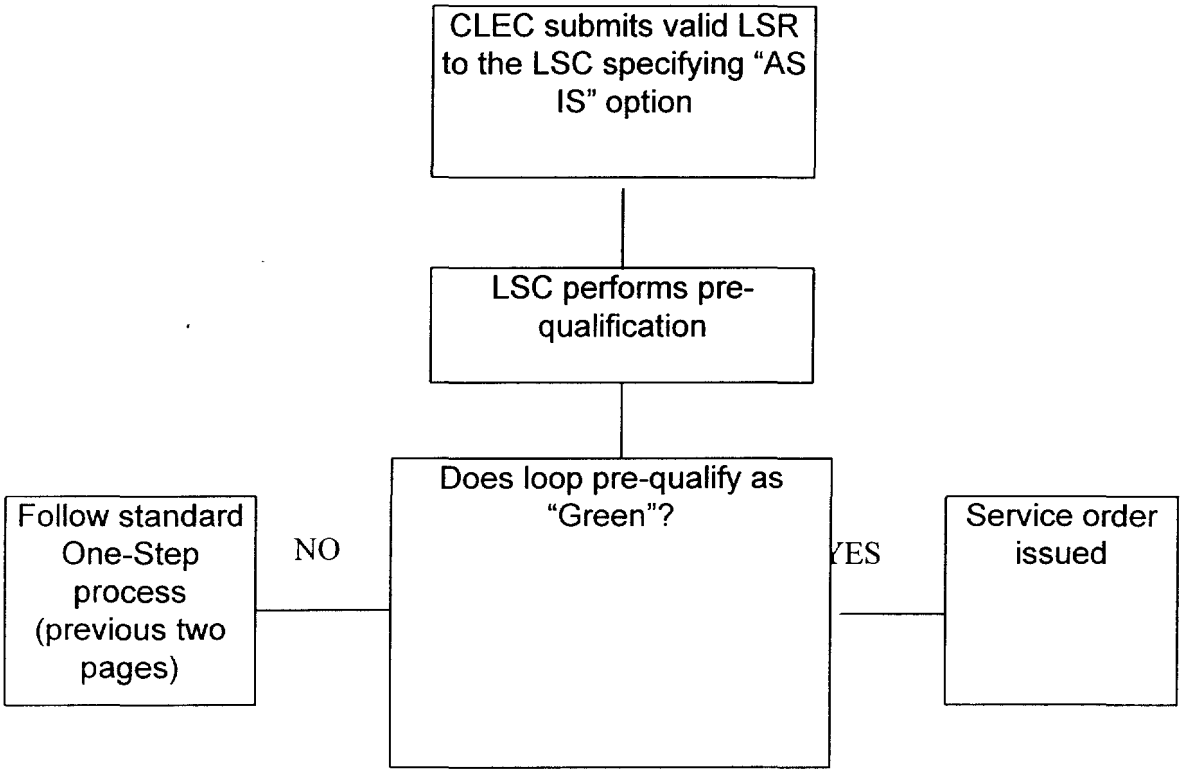


One Step Process
(continued)



An illustration of the One-Step Process with the "AS IS" option follows:

One-Step Process with "AS IS" Option



LSR Requirements for xDSL Capable Loops

The ordering requirements for unbundled loops are contained in the Local Service Ordering Requirements (LSOR). The NC, NCI, and SPEC codes are contained in the Carrier Coding Guide. The following information contains the xDSL specific codes currently documented in these guides. The information below is provided for illustrative purposes only and is subject to change. The LSOR and Carrier Coding Guide should be consulted to determine the available coding options when ordering an xDSL Capable Loop.

SPEC Codes

The SPEC code field on the LSR enables the CLEC to indicate the level of qualification desired and authorize any desired conditioning.

If the CLEC requests a qualified loop, SWBT will only issue an order if the loop qualification results indicate that the loop meets the minimum standards for the designated spectrum management class as specified by Power Spectral Density (PSD) mask. If the CLEC requests a non-qualified loop, SWBT will issue an order even if the loop qualification results indicate that the loop does not meet the minimum standards for the designated spectrum management class. The minimum qualification standards for the spectrum management class are based on the most current version of ANSI T1E1.4 – Spectrum Management for Loop Transmission Standards.

A request for a non-qualified loop will not affect SWBT's internal loop assignment process. It is merely an indication to SWBT of the CLEC's minimum requirements for an acceptable loop. The non-qualified specification does not mean that the CLEC requires a non-qualified loop. It merely means that the CLEC desires the loop to be provisioned even if it does not meet the parameters set forth for its specified PSD based upon the current ANSI standard or draft standard(s). When this option is chosen, SWBT will provide a qualified loop to the CLEC, if one is available, for the specified end user address. If a qualified loop is not available for the specified address, SWBT will provide a non-qualified loop.

The following SPEC codes may be used on initial requests and at any time after the loop qualification process has been performed.

SPEC Code	Usage
UALM13 (PSD#5 Only)	xDSL Capable Loop capable of supporting SWBT's high-speed ADSL tariff offering. The loop order will be processed if loop meets the minimum standards for SWBT's high speed ADSL tariff offering without conditioning. If the loop does not meet these standards, the LSR will be rejected back to the CLEC. Note: CLEC may deploy high-speed offerings without using this SPEC code. It is only used to indicate the CLEC's desire to apply the higher qualification standard utilized by SWBT when qualifying loops for its high speed tariff offering.

SPEC Code	Usage
UALM32	xDSL Capable Loop which meets the minimum qualification standards for the requested PSD. The loop order will be processed if the loop meets minimum qualification standards without conditioning. If the loop does not meet minimum qualification standards for the requested PSD, the LSR will be rejected back to the CLEC. Note: This use of this SPEC code does not limit the speed the CLEC may deploy over the requested loop. It is only used to indicate the CLEC's desire to apply the minimum qualification standard for the specified spectrum management class when qualifying loops.
UALNQX	xDSL Capable Loop that does not meet minimum qualification standards for requested PSD. NOTE: If CLEC specifies this option prior to receiving a loop qualification, it will not be given the opportunity to evaluate the loop qualification results of a non-qualified loop prior to the issuance of a service order. If the pre-qualification results for the loop are "Green," an order will be issued immediately and no loop qualification will be performed. If the loop qualification results are "Yellow" or "Red," an order will be issued upon completion of the loop qualification even if loop exceeds industry standard length or has load coil. Cancellation charges will apply if CLEC determines after evaluating the loop qualification results that the loop will not support CLEC's desired xDSL technology. When used on a supplemental request, this SPEC code indicates CLEC is requesting a non-qualified loop "as is" (without conditioning). Note: This use of this SPEC code does not limit the speed the CLEC may deploy over the requested loop. It is only used to indicate the CLEC's desire not to apply the minimum qualification standard for the specified spectrum management class when qualifying loops. Even when this SPEC code is used, SWBT will provide a qualified loop if one is available.

The following SPEC codes are dependent on the loop qualification results and can only be used after the CLEC receives loop qualification results. **They may not be used on initial requests unless the CLEC has requested a loop qualification on a pre-order basis (the Two-Step process)**:

SPEC Code	Usage
UALRLX	xDSL Capable Loop and removal of load coils. (Applicable if completed loop qualification results indicate that removal of load coils is an available conditioning option.)
UALRTX	xDSL Capable Loop and removal of bridged tap. (Applicable if completed loop qualification results indicate that removal of bridged tap is an available conditioning option.)
UALRRX	xDSL Capable Loop and removal of repeater. (Applicable if completed loop qualification results indicate that removal of repeater is an available conditioning option.)
UALRLT	xDSL Capable Loop and removal of load coil and bridged tap. (Applicable if completed loop qualification results indicate that removal of load coils and bridged tap are available conditioning options.)
UALRTR	xDSL Capable Loop and removal of bridged tap and repeater. (Applicable if completed loop qualification results indicate that removal of bridged tap and repeater are available conditioning options.)
UALRLB	xDSL Capable Loop and removal of load coil, bridged tap, and repeater. (Applicable after loop qualification results provided)
UALRLR	xDSL Capable Loop and removal of load coil and a repeater (Applicable after loop qualification results provided)

NC and NCI Codes

The NC and NCI codes are used to indicate that an xDSL capable loop is being requested and identify the PSD mask for the technology the CLEC has chosen to deploy on the requested loop.

The following table illustrates the current NC, NCI, and Service Code for each PSD. The NCI codes are the same at both the central office and end user location (NCI and SECNCI on the LSR).

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4	LX--	02DU5.004
5	AC--	02DU9.005
7	LX--	02DU9.007

OPEN MEETING/FINAL ORDERS

TELEPHONE ISSUES

PUBLIC UTILITY COMMISSION

NOVEMBER 4, 1999

KENNEDY REPORTING SERVICE, INC.

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previously and potential witnesses were sworn at this time)

CHAIRMAN WOOD: Ms. Schultz, are you representing --

MS. SCHULTZ: I'm legal attorney for Rhythms and NorthPoint, just if you have any questions.

CHAIRMAN WOOD: Got it. We had a number of data points from the CLECs and I believe relative corresponding data from Bell.

Where are we on putting those two together, as far as massaging your data with their data, or tell me where the state of play is on that, Kathy.

JUDGE FARROBA: Yesterday at 1:00 that would correlate the order numbers that were given to us by the CLECs with the data that Bell gave us.

So we now can possibly analyze the two based on corresponding numbers. The Staff hasn't been able to do that yet. We have talked about the issue of the preordering and ordering processes, and we've looked at results independently at this point, but we haven't been

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able to sit down and look at the actual data and compare it one-on-one per order number at this point.

CHAIRMAN WOOD: Can we get the Company to actually put those two side-by-side like we did in this report here, in that same format that we did time in and time out and what they said that we said, and then explain the difference?

I think what we've got to figure out is, we don't have a performance measure that is capturing what we think we need to capture on DSL, at least in part. I think 55.1 probably is in better shape than 57.

JUDGE FARROBA: Right.

CHAIRMAN WOOD: I just think I want to know what -- is there a difference between how you-all have collected, particularly on 55.1 and on the makeup and what you-all have experienced or not?

WITNESS GOODPASTOR: Well, I can't speak to what Southwestern Bell has collected. I can tell you what our experience has been.

CHAIRMAN WOOD: Have you seen their report of what is your own data?

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WITNESS GOODPASTOR: No. For the record, this is Chris Goodpastor, with Covad.

No. I haven't seen that report. It was submitted to Staff. We submitted our data to Staff separately.

MR. LEAHY: And, Mr. Chairman -- Tim Leahy -- we also haven't seen the Covad documentation.

I should note, Mr. Chairman, we have two more individuals representing Southwestern Bell who are involved in the operations. We might swear them in as well.

CHAIRMAN WOOD: Have you-all been sworn?

MS. HAMM: Not today.

(Witnesses sworn)

WITNESS GOODPASTOR: Mr. Chairman, I will note that the Companies did trade PON numbers that they believe were responsive to the Staff's Request for Information.

And Covad submitted a list of those PON numbers that either were missing from our list or were missing from Southwestern Bell's list.

I think that's what Judge Farroba is referring to. They haven't had a chance to

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correlate or reconcile yet.

CHAIRMAN WOOD: Step me through the process again of the CLEC ordering some form of DSL. Assume it's not ADSL.

WITNESS CHAPMAN: Okay. Well, the normal process for DSL would be that they would submit an LSR.

CHAIRMAN WOOD: By hand or -- by fax or by --

WITNESS CHAPMAN: Either. Whatever mechanism they use to submit their LSR they can either fax it or LEX EDI however they choose. They submit a loop LSR for -- oh, I'm Carol Chapman. I'm sorry -- for a DSL loop type.

We are automatically initiating a loop qualification for them at that point so that they don't have to submit a separate request. At that point --

CHAIRMAN WOOD: Can they issue --

WITNESS CHAPMAN: Yeah. We've had a couple of CLECs who have asked to do that, just on a purely pre-qual basis, and we've let them do that. That's fine.

It just slows down the order flow,

WITNESS GOODPASTOR: Yes, we do, although we're not allowed to offer it in the same manner that Southwestern Bell provides it to itself, because they don't allow us to line share, which actually it contributes to a lot of the delay in the provisioning process that we see here.

But just let me say that our experience with the ordering process is vastly different from what's been described by Southwestern Bell today. I would like the opportunity to give you those details if you like.

CHAIRMAN WOOD: It's time.

WITNESS GOODPASTOR: First of all, they mentioned that an LSR can be submitted through an EDI system. That's not offered to Covad today. We submit all of our LSRs through fax only.

Until two weeks ago, we were not provided all the loop qual information upon receiving a reject notice. Two weeks ago they started a new policy where they were going to provide that information upon reject.

I'm not sure how widely that's been implemented, but I do know that they did start

offering that two weeks ago.

But most of the orders that you see on our historical data that we submitted, that was not the case.

CHAIRMAN WOOD: So, in other words, this engineer's report about everything you need to know about that line, you did not get before two weeks ago which you get now?

WITNESS GOODPASTOR: Well, I'm not sure how often we get it. But what happens is, if you submit an LSR and it gets rejected for a particular reason by Southwestern Bell, before, two weeks ago, we had to submit another request for loop qual information, and that would take however many days it took.

And then we would get that back and we would know why it was rejected, essentially, by Southwestern Bell. Now, they have at least told us that they are going to start implementing this new process, and I'm not sure how quickly or how widely it's been implemented.

But they at least told us in the past two weeks that they are going to start providing full loop qual information upon giving us the reject notice.

COMM. WALSH: Did this happen after the hearing, almost two weeks ago?

WITNESS CHAPMAN: No. That is an inaccurate statement. I'm sorry. This is Carol Chapman. On every reject, we do not send back a loop qual. We only send back a loop qual on a reject that was rejected for a qualification reason.

If it's rejected for, say, an invalid address, incomplete information, didn't fill out the fields, no, we do not send back the loop qual information at that time because we don't have a valid LSR. If they had submitted the order electronically, it probably wouldn't have even gotten to the LSC.

It would have rejected back on a fatal error. And Covad does have the opportunity to order LEX, submit their LEX, or if they want to develop the EDI, that's not prohibited to them. They haven't chosen to do that at this time, but that's --

JUDGE FARROBA: But that was just recently offered -- right -- the LEX option?

WITNESS KELLY: For everybody, not just --

WITNESS CHAPMAN: Right. The LEX option is fairly recent.

WITNESS KELLY: This is Bryan Kelly, with Southwestern Bell. And I would just like to add that I work with Michael Smith with Covad who is in the provision development on a daily basis.

And the process that Carol Chapman just described is the process that myself and Michael had an agreement on since they began submitting LSRs. I'm not real sure what Mr. Goodpastor is referring to or who gave him that information.

But if we spoke to Michael Smith, I think he'd verify that the process that Carol just gave is the process we've been abiding by for the last two months.

WITNESS GOODPASTOR: If can address that. The information I just gave was directly from Michael Smith in the service delivery department. So I take issue with that.

JUDGE FARROBA: Well, it also --

COMM. PERLMAN: I mean, this is hearsay. So let's get them on the phone.

CHAIRMAN WOOD: Kathy.

JUDGE FARROBA: We were on call

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October 21, 1999

Hand-Delivered

The Honorable Pat Wood
The Honorable Judy Walsh
The Honorable Brett Perlman
Public Utility Commission of Texas
1701 N. Congress Avenue, Suite 7-170
Austin, Texas 78701

RE: Docket No. 16251; *Investigation Into Southwestern Bell Telephone Company's Entry Into the Texas InterLATA Market;* Docket No. 20000, *Operations Support Testing Commission Relating to the Investigation into Southwestern Bell Telephone Company's Entry into the InterLATA Telecommunications Market in Texas*

Dear Chairman Wood, Commissioner Walsh and Commissioner Perlman:

This letter is filed on behalf of Rhythms Links, Inc. ("Rhythms") (formerly known as Accelerated Connections, Inc.). Rhythms wants to clarify or to correct an apparent misconception raised by Chairman Wood at the end of the discussion on Southwestern Bell Telephone Company's ("SWBT") Operational Support Systems ("OSS") capabilities for DSL services during yesterday's Open Meeting. The undersigned stood to clarify facts in this regard, but was not given an opportunity to do so. However, because the Commission will consider this issue again today, Rhythms believes it is imperative to provide the clarification in this record.

Rhythms is not aware of any fact contained in the record of either docket nor in the Telcordia Final Report that alleges or insinuates that Rhythms "drug its feet" or "intentionally" did not participate in the Telcordia testing process for DSL pre-ordering and ordering processes. The chronological events dispel that notion.

Contrary to any assertion otherwise, Rhythms is not "dragging its feet" to provide DSL service in Texas. In fact, Rhythms has diligently pursued its arbitration and implementation of the Interim Agreement. The reality is that at the time the Telcordia testing began, Rhythms was still arbitrating the terms, conditions, and rates for the

Interconnection Agreement with SWBT and did not have any interim agreement. During the arbitration, Rhythms filed numerous applications with SWBT for caged collocation to procure space to place equipment to provide xDSL-based services upon the conclusion of the arbitration. Due to the delay in the arbitration, and as a result of the Commission's and parties' efforts, the Interim Agreement was executed which allowed interim measures for Rhythms to request cageless collocation and to provision xDSL-capable loops. Rhythms appreciates the work that the Commission did in pursuing an Interim Agreement, but implementation of the agreement takes time (since before the agreement, Rhythms was only limited to seeking caged collocation). Within two days of execution of the Interim Agreement this summer with SWBT, Rhythms converted all of its pending collocation applications seeking cageless collocation because cageless collocation was less costly and more time efficient. It has taken sixty, ninety days (or longer) to obtain collocation space on a phased-in basis. During that wait for collocation space, Rhythms procured necessary equipment, and upon acceptance of collocation space, began commercial testing. Indeed, within the last thirty days, Rhythms has manually placed orders for DSL-capable loops under the existing terms of the Interim Agreement in Texas. Rhythms is not aware of any mechanized ordering process for ordering xDSL-capable loops.

As Chairman Wood noted yesterday, this is a situation in which the Commission needs to consider a scenario in which a carrier needs to procure space and equipment. That is exactly what Rhythms has been doing since the Interim Agreement was executed. As can be seen from the factual chronology of events, Rhythms was not in a position to place orders during the Telcordia testing. Therefore, it would be completely inaccurate to conclude that Rhythms had intentionally delayed placing orders or did not participate in the Telcordia testing for any other reason other than it was not in a position to do so. Rhythms was never asked to participate in the Telcordia testing, and could not have until the last thirty days; but is not due to lack of effort or desire on Rhythms' part.

Rhythms recognizes the importance of balancing the interests of SWBT and CLECs who wish to enter the xDSL market. However, such balancing is not possible if the Commission is asked to rely on data that is neither accurate nor balanced. Rhythms respectfully suggests that some of the communications the Commission has apparently received have completely mischaracterized the motives and activities of the CLECs in connection with Telcordia's testing of SWBT's OSS capabilities. To be clear, Rhythms has not, nor would it have any motivation, to undermine Telcordia's testing efforts. As discussed above, Rhythms was simply not in a position to participate in such testing due to the lengthy delays it encountered first in negotiating an interconnection agreement with SWBT and then, in litigating a sanctions proceeding that arose out of SWBT's improper conduct during discovery. Rhythms is now in a position to participate in OSS testing with Telcordia, and although the Commissioners did not inquire, Rhythms would readily

agree and requests an opportunity to participate in further testing of SWBT's OSS capabilities.

The Federal Telecommunications Act requires the Commission to determine that SWBT actually has OSS capabilities that fully support both its own retail and CLEC xDSL operations. Rhythms notes that the state of the record in this proceeding is markedly different from information SWBT provided about its OSS capabilities during its arbitration with Rhythms, thus further testing is required. It is inappropriate to ask the Commission to rely on theoretical predictions, unsupported assertions, or factual mischaracterizations as the basis of a decision regarding SWBT's OSS capabilities.

Thank you for consideration of this clarification of the facts on this issue. Please do not hesitate to contact me if you have any questions.

Sincerely,

Katherine K. Mudge

cc: All Parties of Record (via telecopier)
The Honorable Howard Seigel (hand-delivered)
The Honorable Katherine Farroba (hand-delivered)
The Honorable Donna Nelson (hand-delivered)
The Honorable Nara Srinivasa (hand-delivered)
Mr. Eric Geis
Mr. Steve Bowen

RHYTHMS LINKS
11/22/99

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SUPPLEMENTAL AFFIDAVIT OF ERIC H. GEIS ON BEHALF OF RHYTHMS LINKS, INC. IN RESPONSE TO THE COMMISSION'S NOVEMBER 5, 1999 MEMORANDUM

Date Filed:
November 22, 1999

PROJECT NO. 16251

INVESTIGATION OF	§	PUBLIC UTILITY COMMISSION
SOUTHWESTERN BELL TELEPHONE	§	
COMPANY'S ENTRY INTO THE	§	OF
TEXAS INTERLATA	§	
TELECOMMUNICATIONS MARKET	§	TEXAS

SUPPLEMENTAL AFFIDAVIT OF ERIC H. GEIS
ON BEHALF OF RHYTHMS LINKS INC., IN RESPONSE
TO THE COMMISSION'S NOVEMBER 5, 1999 MEMORANDUM

SUPPLEMENTAL AFFIDAVIT OF ERIC H. GEIS

I, Eric H. Geis, declare as follows:

1. I am over eighteen years of age, am of sound mind and competent to make this Affidavit.

2. I have personal knowledge of all of the facts presented in this Affidavit.

3. I am Vice President of National Deployment at Rhythms NetConnections, Inc., the parent company of Rhythms Links Inc. ("Rhythms"), as well as and Secretary and Treasurer of Rhythms. My business address is 6933 South Revere Parkway, Englewood, Colorado 80112.

4. Based on my knowledge of the experiences Rhythms has had in attempting to order and provision DSL-capable loops in Texas, Southwestern Bell Telephone Company ("SWBT") has fallen far short of providing sufficient facilities and systems to support the ordering and provisioning of DSL-capable loops.

I. SWBT's Training Is Inadequate

5. SWBT has failed to provide sufficient or timely instruction and training to Rhythms on how to use SWBT's Operations Support Systems ("OSS"). For instance, SWBT has known since June, 1998 that Rhythms and other data CLECs intended to order DSL-capable loops in Texas. Despite more than a year to prepare, SWBT did not begin to include pre-ordering and ordering of DSL-capable loops in training classes offered to CLECs until very recently. Indeed, as recently as September, 1999 (which was over five months after the Arbitrators in Rhythms' arbitration with SWBT issued Order No. 5 requiring SWBT to begin provisioning DSL-capable loops), Rhythms' personnel attended SWBT's loop pre-ordering and ordering

classes, and were surprised to find no mention whatsoever of the methods and procedures for ordering DSL-capable loops.

6. SWBT did not make available OSS training to Rhythms for pre-ordering and ordering DSL-capable loops until October 11, 1999. To make matters worse, SWBT only allowed one Rhythms employee to attend this training, even though the SWBT representative had promised Rhythms that three employees could attend.

7. SWBT's training classes are offered only in Texas, twice a month, and the class size is severely restricted. At the November 4-5, 1999 training class attended by the Rhythms employee, the class was limited to five trainees.

8. The November 4-5 class did not convey all of the necessary methods, procedures and information required to place DSL loop orders. For example, as discussed further below, Rhythms employees discovered after this class that SWBT had failed to offer training on all of the codes and field entries required to place an order successfully.

II. SWBT's Pre-ordering and Ordering Systems are Inadequate and Create Multiple Delays in Processing Rhythms' Orders

9. To date, Rhythms has had only a few orders for DSL-capable UNE loops successfully filled by SWBT, and has experienced multiple and repeated problems with many orders.

10. Until very recently, Rhythms had to use manual processes to submit its orders for DSL-capable loops. SWBT did not begin offering an electronic interface for placing orders until October 23, 1999. SWBT's electronic interface and ordering system are known as Toolbar and LEX, respectively.

11. SWBT's electronic interface and ordering systems are not stable or user-friendly. For example, even with assistance from SWBT, it took over four hours to load SWBT's Toolbar software on a single PC. Additionally, Rhythms and SWBT personnel assisting Rhythms have encountered numerous difficulties with LEX, including interface errors with the Windows NT operating system, and SWBT server lockups and unavailability.

12. There have been several coding problems with SWBT's OSS. First, SWBT has entered incorrect carrier codes for Rhythms in its mechanized order interface. The ACTL and CCNA are hard coded (i.e., not user-changeable) in SWBT's OSS. Because SWBT entered Rhythms' codes incorrectly, Rhythms' orders were rejected repeatedly. Second, SWBT has provided conflicting information regarding Network Channel/Network Channel Interface ("NC/NCI") codes. Such codes are required in order to process orders electronically.

13. Third, SWBT's system keeps rejecting orders due to the entry in the "design contact" field. This field, which is indicated as optional, identifies the Rhythms employee who is responsible for the loop order. On one order alone, Rhythms had to try five different entries to find the syntax that SWBT's system would accept. SWBT did not cover this issue in its training. It is difficult to understand why SWBT would design its system to reject an order simply on the basis of an entry in an optional field.

14. Rhythms has also experienced problems with its orders due to the way in which SWBT handles circuit ID number assignments. SWBT does not assign circuit ID numbers for mechanized orders even though SWBT did make such assignments for manual orders. In order to obtain a circuit ID number, Rhythms must contact SWBT's LSC to receive a block of numbers for each circuit type (i.e., ADSL, SDSL, IDSL). Thus, the circuit assignment

process adds a manual step even to mechanized orders. Once such circuit ID numbers are obtained, Rhythms has had difficulties assigning such codes when placing an order. Only after several orders were rejected, and Rhythms was unable to determine the cause of the problem, did SWBT inform Rhythms' personnel that a special extension (". . sw") must be placed at the end of the circuit ID number in order for SWBT's system to recognize the assignment as valid. This information was not provided to Rhythms during SWBT's DSL-capable loop ordering training course.

15. Even after an order has been successfully entered, SWBT does not automatically notify Rhythms when the order is complete. Instead, Rhythms' personnel must keep checking to determine order status.

16. Assuming that SWBT is willing and can correct all of the problems discussed above, SWBT's ordering system as currently constituted will still cause ordering problems for Rhythms and other CLECs. First, SWBT's ordering process is only designed to support SWBT's particular retail implementation of ADSL. As a result, SWBT's ordering system will reject orders that do not conform to SWBT's criteria for its retail service. For example, orders for loops longer than 17,500 feet are rejected. Rhythms has deployed DSL technology in other states that can be used on loops over 20,000 feet in length, and intends to deploy this same technology in Texas.

17. Second, SWBT insists on putting all orders for DSL-capable loops through its "loop qual" process, which is a manual process. Thus, even after SWBT develops a mechanized ordering system that works, orders will not flow through due to this manual step.